RIVKINS

HILL RIVKINS & HAYDEN LLP

45 Broadway, Suite 1500, New York, NY 10006-3739 Tel: (212) 669-0600 Fax: (212) 669-0698/0699 e-mail: thefirm@hillrivkins.com

Website: www.hillrivkinslaw.com

MEMO ENDORSED

May 19, 2008

The Honorable Richard M. Berman United States District Judge United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl St., Room 650 New York, NY 10007

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(Final). Connect to advise

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status.

SO ORDERED:

Richard M. Berman, U.S.D.J.

Explosion and Fire at

Carena Shipyard 5/8/04

USDC-SDNY 07 CV 11346 (RMB)

Our File No.: 29710-JAS/KCL

Dear Judge Berman:

We represent the Plaintiff in the captioned matter and write to update the Court of the status of the captioned matter since our last status dated February 25, 2008, as instructed by chambers on that date.

This case was filed under Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, in order to attach property of the defendant to establish jurisdiction over this matter. Accordingly, we have been serving the Process of Maritime Attachment and Garnishment ("PMAG") upon banks doing business in New York to attach funds of the defendant. Since the date that the PMAG was granted, we have been serving process daily upon JP Morgan Chase Bank, Citibank, American Express Bank, Bank of America, Bank of New York, Deutsche Bank, HSBC, BNP Paribas, Wachovia Bank, ABN Amro, Atlantic Bank of New York, Standard Chartered Bank, Bank of Communications, The Bank of East Asia, Bank of China, Shanghai Commercial Bank Ltd., Bank of Tokyo-Mitsubishi, Bank of

New Jersey 175 North Broadway South Amboy, NJ 08879-1638 Tel: (732) 838-0300 Fax: (732) 316-2365 e-mail: thefirm@hillrivkins.com TEXAS
712 Main Street, Suite 1515
Houston, TX 77002-3209
Tel: (713) 222-1515 Fax: (713) 222-1359
e-mail: hillrivkinstexas@hillrivkins.com

CONNECTICUT

60 Quarry Dock Road

Branford, CT 06405-4654

Tel: (203) 315-9274 Fax: (203) 315-9264
e-mail: hillrivkinsct@snet.net

CALIFORNIA
Hill Rivkins/Brown & Associates
11140 Fair Oaks Boulevard, Suite 100
Fair Oaks, CA 95628-5126
Tel: (916) 535-0263 Fax: (916) 535-0268
e-mail: thefirm@brnlaw.com

The Honorable Richard M. Berman United States District Judge May 19, 2008 Page 2 of 2

India, Barclays Bank, Calyon Bank, Credit Suisse, Rabobank, Wells Fargo Bank, US Bank, UBS, and Nordea Bank Finland. To date we have not been able to attach any funds of the defendant. We would like to continue our daily service as we anticipate that funds belonging to the Defendant will be present within the District at some point in the near future.

Accordingly, we respectfully request that we be allowed to continue efforts to attach property of the Defendant, and that we continue to give status updates to the Court every 60 days. We thank the Court for its assistance in this matter, and if there are any questions we are ready to address this issue, or any other issue, at the Court's convenience.

Respectfully Submitted,

HILL RIVKINS & HAYDEN LLP

Kipp C. Leland

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